

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DEBRA GOODMAN, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

CLARIFAI, INC., a Delaware corporation,

Defendant.

Case No. 22-cv-02280

NOTICE OF DISMISSAL WITHOUT PREJUDICE

Pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Plaintiff Debra Goodman hereby dismisses this action without prejudice. In support, Plaintiff states as follows:

1. Federal Rule of Civil Procedure 41(a)(1)(A)(i) provides, in relevant part, that “the plaintiff may dismiss an action without a court order by filing . . . a notice of dismissal before the opposing party serves either an answer or a motion for summary judgment.”

2. Plaintiff filed this case on March 21, 2022, and Defendant Clarifai, Inc. has not answered the complaint or moved for summary judgment.

3. As such, Plaintiff dismisses this action without prejudice. This dismissal has no effect on the claims of any absent, putative class members.

Respectfully submitted,

DEBRA GOODMAN,

Dated: May 2, 2022

By: /s/ Benjamin R. Osborn
One of Plaintiff's Attorneys

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*Admission *pro hac vice* to be sought